

"Please file in case"
 IN THE UNITED STATES DISTRICT COURT
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA 2-2-01
 02/01/01
 (9)
 (SC)

JOHN RICHARD JAE,

Plaintiff,

vs.

SUPERINTENDENT DRAGOVICH,

OFFICER VALENTINE,

OFFICER ZIMMERMAN,

OFFICER TAYLOR,

OFFICER Novak

OFFICER NEVY and

OFFICER SWIFT,

Defendants.

1 CIVIL NO. 1: CK-00-216

1 U. S. DISTRICT Judge Ra

1 Magistrate Judge Snyder,

1 JURY TRIAL DEMAND

FILED

HARRISBURG, PA

FEB 1 2001

MARY E. DIANDREA, CL
 Per _____
 Deputy Clerk

AMENDED COMPLAINT

COMES NOW, the Plaintiff John Richard Jae, Psse and Inform
 as a Layman Unlettered in the Arts & Sciences of the Laws & Legal
 within the United States & now files his Amended Complaint in
 the above-captioned CIVIL RIGHTS ACTION, & who, avers, deposes &

1. That, he is John Richard Jae, the Plaintiff Psse cause in
 above-entitled CIVIL RIGHTS ACTION and he makes this Amended
 pursuant to Fed. R. CIV. P. Rule 15(a).

2. Plaintiff John Richard Jae filed his initial CIVIL RIGHTS
 pursuant to 42 U.S.C. §1983, herein the above-captioned CIVIL
 on about November 26, 2000.

3. Plaintiff John Richard Jae, now amends his initial Complain
 as a matter of right, pursuant to Fed. R. CIV. P. Rule 15(a), and in
 herein by Reference hereunto the same, all of that stated & set forth
 his initial Complaint and avers, deposes & states, as follows:

4. When Plaintiff Complained to Defendant [REDACTED] SUP
 Dragovich about the acts, actions & conduct of Defendants to
 Zimmerman, Taylor, Novak, Nevy and Swift, in opening & refusing
 to accept Plaintiff's [REDACTED] when it was ready [REDACTED] and

11 You have got of nerve complaining given your poor behavior and constant abuse of our staff. When you can start acting like a human being, we can talk. Right now, your credibility is not good ((Quote/Signature)).

5. That, the above-replied letter to Plaintiff was dated, Sep 26, 2000.

6. That, the above-response of Defendant Superintendent Dragovich, amounts to illegal retaliation for Plaintiff's belief for which the Plaintiff had already been punished for by the ARB Hearing Examiner and which shows such Defendants unwillingness to remedy the acts, actions & conduct of Defendants VD Lentz, Zimmerman, Taylor, Novak, Ney and Swift, and further shows Defendant Dragovich's unwillingness to follow and comply with Plaintiff's rights and the law under the Eighth Amendment of the United States Constitution.

7. That, by opening and refusing to close the windows in the when it was really cold out, Defendants VD Lentz, Zimmerman, Taylor, Novak, Ney and Swift, each caused the Plaintiff to be subjected to imminent danger of serious physical injury because such caused Plaintiff to be placed at risk of catching pneumonia from the cold air thru the open windows.

AND PLAINTIFF FURTHER SAVETH NAUGHT.

I declare under the penalty of perjury that the foregoing is true
Correct, pursuant to 28 U.S.C. § 1746.

RESPECTFULLY SUBMITTED

John Richard JAE
MR. JOHN RICHARD JAE,
#BQ-3219
SCT-Pittsburgh
P.O. Box 6999
Pittsburgh, PA 15236-6999

28th JANUARY 2001

Plage vs. Dragovich, et al.
CIVIL No. 1:00-CV-00-3123
CERTIFICATE OF SERVICE

I certify that on 1/29/01, I mailed to the persons listed below by 1st class U.S. Mail, postage prepaid, a true & correct carbon copy of the within Amended Complaint & each Defendant herein in the above entitled Civil Action.

I certify that on 1/29/01, I gave to ~~PRISON GUARD~~ for mailing to the Court, the original of the above same document.

"I certify under penalty of perjury & pursuant to 28 USC § 1746 that the above, is true & correct."

MR. Ben C. Livingood
Superintendent's Assistant
SCI-Camp Hill
1500 Lebanon Road
P.O. Box 200
Camp Hill, PA 17001-8837

Dated/Executed on:
29th JANUARY 2001
At: Pittsburgh, Pennsylvania

(S) — John Richard
MR. JOHN RICHARD
Plaintiff and his Secon-